



Refrigerated Prepared Foods

2001 Butterfield Road
Downers Grove, IL 60515-1049
(630) 512-1190
(630) 512-1121 Fax

Paul S. Halberstadt
Director,
Environmental Engineering

September 29, 2000

The Performance Track Information Center
Industrial Economics, Inc.
2067 Massachusetts Avenue
Cambridge, MA 02140

Subject: ConAgra Application
EPA Performance Track

Dear Julie Spyres:

Enclosed are 13 applications for multiple facilities within ConAgra for the EPA Performance Track. The facilities are the following:

- ✓ • ConAgra Beef Company, Grand Island, NE A07-0004
- ✓ • ConAgra Beef Company, Kersey, CO A08-0003 ✓
- ✓ • Swift & Company, Worthington, MN A05-0018 ✓
- ✓ • ConAgra Frozen Foods, Council Bluffs, IA A07-0005
- ✓ • Gilardi Foods, Troy, OH A05-0019 ✓
- ✓ • Gilardi Foods, Sidney, OH A05-0020 ✓
- ✓ • Gilroy Foods, Gilroy, CA A09-0013
- Gilroy Foods, Fernly, NV A09-0014
- Gilroy Foods, King City, CA A09-0015
- Gilroy Foods, Umatilla, OR A10-0005 (already processed, no complete ✓ yet)
- ✓ • Armour Swift-Eckrich, Quincy, MI A05-0021 ✓
- ✓ • Butterball Turkey (Swift-Eckrich), Wallace, NC A04-0044 ✓
- ✓ • Swift, Eckrich, Wells, MN A05-0022 ✓

On behalf of the Sustainable Development Council of ConAgra we look forward to participating in this process to demonstrate that environmental and business needs can be successfully combined. If you have any questions, please call me at 630-512-1190.

Sincerely yours,

Paul S. Halberstadt
Director, Environmental Engineering

Attachments (13)

Cc: without attachments

Roger Holtorf - EPA
Phil James

Don Radentz
Alan Meyer

Robb Casseday
Terry Young

Tom Stachura
Robert Harris

A09-0013



***National
Environmental
Achievement Track***

Application Form

GILROY FOODS

Name of facility

Con Agra. Inc.

Name of parent company (if any)

1350 Pacheco Pass Highway

Street address

street address

Street address (continued)

Gilroy, CA 95020

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name nameMark Bellis ,Dan Brown,

Title Q.A. Manager and Plant Manager

Phone 408-846-3297

Fax 408-846-3503

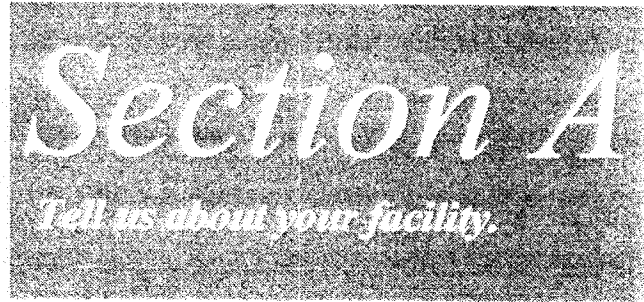
E-mail mbellis@gilroyfoods.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.



1 What do you do or make at your facility?

Dehydrated Vegetable Garlic and Onion food products

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
2034

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes

☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☐ 50-99

☒ 100-499

☐ 500-1,000

☐ More than 1,000

Section A, continued

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

CAD 981457716

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right or enclose a completed Checklist with your application.

Bay Area Air Quality Management District, California
Environmental Protection Agency, California Regional
Water Quality Control Board "storm water", California
Dept. of Health "Drink Water Div.", CUPA "certified unified
program agency

7 Check the appropriate box in the right-hand column.

☒ I've listed the requirements above.

☐ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

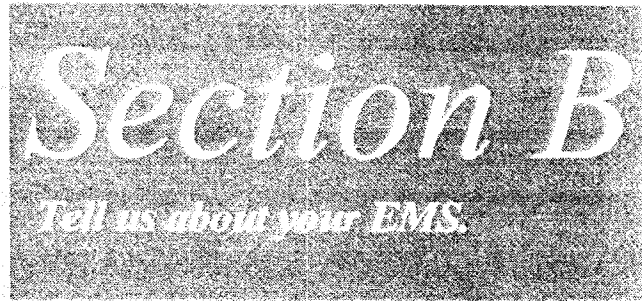
Gilroy Foods has been reducing RCRA waste as for
example in 1997, we have generated 18,103 pounds of
waste and in 1998 reduced it down to approximately
12,567 pounds and in the 1999 further reductions to about
6,133 pounds. As of 8/28/00 our present waste totals to
1,095 pounds.

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.



1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

- | | |
|--|---|
| <i>a.</i> Environmental policy | <input checked="" type="checkbox"/> Yes |
| <i>b.</i> Planning | <input checked="" type="checkbox"/> Yes |
| <i>c.</i> Implementation and operation | <input checked="" type="checkbox"/> Yes |
| <i>d.</i> Checking and corrective action | <input checked="" type="checkbox"/> Yes |
| <i>e.</i> Management review | <input checked="" type="checkbox"/> Yes |

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☒ Self-assessment

☐ GEMI

☒ Other

☐ CEMP

☐ Third-party assessment

☐ ISO 14001 Certification

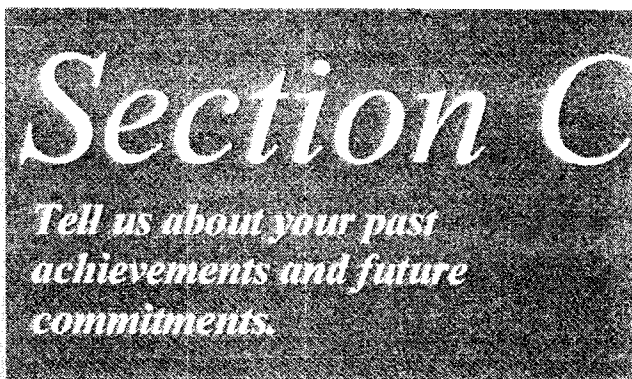
☐ Other

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.



- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Parts washer solvent	430	gal	0	GAL
<p>i. How is the current level an improvement over the previous level?</p> <p>We have at this present time, " no generation of RCRA waste since going to this different parts washer solvent and since this is a cold water parts washer. This equipment is now exempt because of the high boiling point is greater than 302 f. * Pls. note B.A.A.Q.M.D. exemption 118.7 sect.7.1</p> <p>ii. How did you achieve this improvement?</p> <p>By trying different types of parts washer solvents and by interviewing different vendors on the quality and the safety of their product.</p>				

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Q.A. Chemicals	7,697	pounds	5,510	pounds
<p>i. How is the current level an improvement over the previous level?</p> <p>Less federally listed RCRA waste.</p>				
<p>ii. How did you achieve this improvement?</p> <p>A change in our Q.A.lab. procedures has enable us to use less chemicals due to the management's decisions to enlist other plants to process certain products.</p>				

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

a. What is the aspect?

Our future aspect is to gradually phase out the use of the flourescent lighting that contains trace mercury elements.

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value

1800 Flourescent lights
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:
Absolute value 800 floures. lights
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

e. How will you achieve this improvement?

By replacing all flourescent lighting that meets the requirements so they can be properly be disposed in our landfill.

Second aspect you've selected

a. What is the aspect?

Removal of Chlorine Dioxide in our process. This means we will not have to store sodium chlorite or hydrochloric acid on the premises.

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:
Absolute value 500 gallons
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:
Absolute value 0
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

e. How will you achieve this improvement?

By using bromine in place of chlorine dioxide in our process.

Third aspect you've selected

- a. What is the aspect? Water Usage
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- | | |
|---|---|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 2.4 Million Gallons/day
(Quantity/Units) |
| <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- | | |
|---|---|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 2.0 Million Gallons/day
(Quantity/Units) |
| <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
- e. How will you achieve this improvement? By improvements in processing. We are currently studying our wastewater streams for potential reductions.

Fourth aspect you've selected

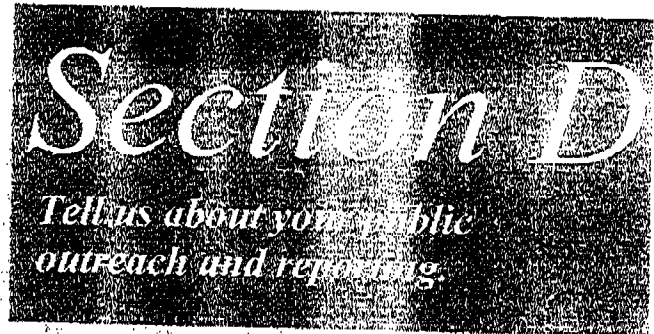
- a. What is the aspect? Ag Waste
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- | | |
|---|-----------------------------------|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 45.5 tons/day
(Quantity/Units) |
| <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- | | |
|---|-----------------------------------|
| <input checked="" type="checkbox"/> Option A:
Absolute value | 23.0 tons/day
(Quantity/Units) |
| <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
- e. How will you achieve this improvement? By improvements in ag waste recovery and by diverting ag waste for use as animal feed.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.



1 How do you identify and respond to community concerns?

We at Gilroy Foods have a good working relationship with the city of Gilroy Fire Department as in making the Hazardous Materials Business Plan available and to have passed all fire safety inspections. Another inspection was done by our risk consultants "Global Risk Consultants" on the loss prevention reports on fire and associated perils for Gilroy Foods.

2 How do you inform community members of important matters that affect them?

By reporting the Consumer Confidence Report in regards to the quality of our drinking water supply to the California Health Services and to comply with the Federal Safe Drinking Water Act. This is made available on our company bulletin board and our company news letter.

3 How will you make the Achievement Track Annual Performance Report available to the public?

This information can be available to any consumer by contacting the California Department of Health Services in Sacramento "Drink Water Division"

- ☐ Website www.gilroyfoods.com
- ☐ Newspaper
- ☐ Open Houses
- ☒ Other

Available at Plant location

4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	Organization	Name	Phone number
Representative of a Community/ Citizen Group	Annual Garlic Festival	Joanne Kestler	408-842-1625
State/Local Regulator	CUPA City of Gilroy	Loida Osoteo	408-846-0430
Other community/local reference	Economic Development Program	Bill Lindsteadt	408-847-7611

On behalf of Gilroy Foods Plant
[my facility].

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

 9/26/02 11-2-00

Printed Name/Title

Dan Brown, Plant Manager

Facility Name Gilroy Foods Plant

Facility Street Address 8180 Arroyo Circle
Gilroy, Ca. 95020-7305

Facility ID Numbers CAD981457716

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140